

CHAPTER 144. CONDUCT FACILITY INSPECTION OF A PILOT SCHOOL

SECTION 1. BACKGROUND

1. PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY CODES.

- For initial certification: 1371
- For surveillance: 1640

3. OBJECTIVE. The objective of this task is to determine that an applicant for a Federal Aviation Regulations (FAR) Part 141 certificate meets the certification requirements or that an existing school continues to comply with the FAR. Successful completion of this task results in an indication of either a satisfactory or an unsatisfactory inspection.

5. GENERAL. The initiative for this task comes from either the Flight Standards District Office (FSDO) work program schedule or the regional office. Facility inspections are always conducted during the initial certification of a pilot school and at 24 month intervals during the certification renewal. They may also be conducted during spot checks initiated for quality control purposes. A facility inspection generally covers all areas pertinent to the certificate.

7. GUIDELINES FOR CONDUCTING FACILITY INSPECTIONS.

A. Coordination. When an airworthiness inspector cannot attend the facility inspection, the operations inspector should tailor the inspection to examine the aspects that an airworthiness inspector would normally examine. For example:

(1) The inspector should be prepared to examine any available aircraft.

(2) The inspector should coordinate with the principal maintenance inspector and the principal avionics inspector to ensure followup inspections of any items outside of the operations inspector's expertise.

B. Levels of Deficiency and Appropriate Corrective Action. Following are some examples of various deficiencies that might occur in an inspection, and the appropriate action to take for each situation. The actions described are based on two assumptions.

(1) Even if a discrepancy is found, the inspector continues the facility inspection for all items. After inspection, all the deficiencies and recommended corrective actions are summarized in a note to the file and/or in remarks on the Federal Aviation Administration (FAA) Form 8000-36, Program Tracking and Reporting Subsystem Data Sheet.

(2) An unsatisfactory report may initiate an enforcement investigation. Unsatisfactory reports are usually based on obvious violations found during the inspection. There are intermediate stages between satisfactory and unsatisfactory results, any of which may result in a satisfactory inspection with corrective action.

(a) A spot correction involves a discrepancy that was not a violation and was noted and corrected during the inspection. Because it was corrected "on the spot," it may require no further action. An example of a spot correction is as follows: The inspector finds a student record that does not contain the student's date of graduation in the appropriate box. However, a photocopy of the student's graduation certification with the date is included with the record. The corrective action consists of the inspector notifying the school of this discrepancy. During the remainder of the inspection, the chief instructor enters the record according to the school's procedures. Additional corrective action is not necessary. However, the inspector marks the FAA Form 8000-36 with an "I" indicating information. The inspector notes the discrepancy and the spot correction on the PTRS Data Sheet and/or the job aid.

(b) A followup action involves a deficiency or a lack of pilot knowledge or skill that does not involve a violation but does require action other than a spot correction. For example, during an inspection the inspector noted that the pretakeoff and prelanding checklists were not in the aircraft and that copies of the checklists were not readily available. There was no evidence that the aircraft had been operated for student instruction without the checklists. The corrective action consists of the inspector verbally advising

the operator that the checklists must be in place before the aircraft is operated again for instruction in an FAA-approved course. At the office, the inspector confirms this in writing to the operator and schedules a followup inspection to determine that the checklists were replaced. The inspector then marks the FAA Form 8000-36 with an "F" indicating a followup action.

(c) A blatant violation is cause for a finding of Unsatisfactory for the facility inspection. For example, during the inspection, an inspector finds that training was conducted for more than 60 days without a chief instructor. The inspector marks the FAA Form 8000-36 with an "E" indicating that the inspection resulted in an enforcement investigation (see volume 2, chapter 182 of this handbook, and FAA Order 2150.3, Compliance and Enforcement).

C. Presence of Chief Instructors and Other Instructors During Inspection. It is desirable to spot check the knowledge and skill of the instructors used by a school. Spot checks of instructors are necessary to verify continuing compliance and to ensure that the chief instructors are fulfilling their responsibilities in standardizing instruction.

D. Discrepancies Between FSDO Files and Operator Files. When a discrepancy is found between office records kept on the operator and records maintained by the operator, the inspector determines which set of records is current, approved, and correct. The outdated records must be brought up to date. For example, if the operator's records indicate a change in address of the base of operations that the FAA was not aware of, FSDO records must be altered to reflect the correct address. The inspector determines whether an enforcement action is necessary and updates the Vital Information Subsystem files.

9. INITIAL CERTIFICATION VS. LATER SURVEILLANCE. When this task is performed as the facility inspection for an original certification during the demonstration and inspection phase of the certification process, there are some items that cannot be inspected. For example, an applicant for an application will not have complete student records for the inspector to examine. For an original certification, the inspector marks the "N/A" column on the job aid (figure 117-1) for items that cannot be evaluated.

SECTION 2. PROCEDURES

1. PREREQUISITES AND COORDINATION REQUIREMENTS.

A. Prerequisites. This task requires knowledge of the regulatory requirements of Federal Aviation Regulations (FAR) Part 141, Federal Aviation Administration (FAA) policies, and qualification as an aviation safety inspector (ASI) (operations).

B. Coordination. This task requires coordination with the principal operations inspector (POI) and the airworthiness unit.

3. REFERENCES, FORMS, AND JOB AIDS.

A. References.

- FAR Parts 1, 61, 91, and 141
- FAA Order 2150.3, Compliance and Enforcement

B. Forms.

- None

C. Job Aids.

- FAR Part 141 Facility Inspection Job Aid, (figure 144-3)
- Sample letters and figures

5. PROCEDURES.

A. Pre-Inspection Activities.

(1) Determine the need for the inspection.

(a) Is the inspection scheduled on the Flight Standards District Office (FSDO) work program?

(b) Is the inspection a request of the regional office or of national headquarters?

(c) Is the inspection the result of complaints?

(d) Is the inspection part of the certification process?

(2) Determine if the inspection is to be conducted with or without notice to the school. Conduct initial certification inspections according to the submitted schedule of events.

(a) If the inspection is to be conducted with notice to the school, notify the school in writing of the day, time, and nature of the inspection (figure 144-1).

(b) If the inspection is to be conducted without notice to the school, schedule the day and time.

(3) Review the school's FSDO file for complaints, previous enforcement history, accident/incident history, previous facility inspections and surveillance reports, and previous regional or national work program actions.

(4) Review the school's FSDO file with the airworthiness or the avionics units for a plan of action and for any specific problem areas.

B. Program Tracking and Reporting Subsystem (PTRS). Open PTRS file.

C. Conduct Facility Inspection.

(1) Determine if the following documents are current, complete, and accurate (for a certificated air agency, a sampling may be sufficient):

- (a) the school certificate (FAR § 141.19);
- (b) the list of approved courses;
- (c) the facility use agreement;
- (d) the type of advertisement (FAR § 141.23);
- (e) the chief/assistant flight instructor records;
- (f) the flight instructor records;
- (g) the student records (FAR § 141.95 and 141.101);
- (h) the enrollment certificates (FAR § 141.93);
- (i) the graduation certificates (FAR § 141.95);
- (j) the aircraft records (including aircraft checklist);
- (k) the practical test standards (PTS); and
- (l) the training course outline (TCO) revisions (must match revisions in FSDO file).

(2) Inspect the following physical facilities and equipment for compliance:

- (a) the airport (FAR § 141.37);
- (b) the aircraft (airworthiness);
- (c) the ground trainers and training aids (FAR § 141.41);
- (d) the pilot briefing areas (FAR § 141.43); and

(e) the ground training facilities (FAR § 141.45).

(3) Check these additional points:

(a) the compliance with provisions of FAR § 141.77;

(b) the flight instruction (FAR § 141.79);

(c) the quality of instruction (FAR § 141.83); and

(d) the chief flight instructor's duties and responsibilities (FAR § 141.85).

D. Satisfactory Facility Inspection. If the facility inspection is satisfactory, indicate the outcome on the job aid.

(1) For an initial certification, ensure that the job aid becomes part of the certification report.

(2) For post certification surveillance, place the job aid in the FSDO file on the school.

E. Unsatisfactory Facility Inspection.

(1) If the facility inspection was unsatisfactory when conducted as part of an initial certification, inform the applicant immediately of the discrepancies.

(a) Advise how to correct any deficiencies or discrepancies.

(b) Confirm the findings in writing (figure 144-2), including a suspense date for correction of deficiencies.

(c) Note the outcome on the job aid, and ensure that the job aid is included in the certification report.

(2) If the facility inspection was unsatisfactory when conducted as part of post certification surveillance, note the outcome on the job aid.

(a) Place the job aid in the FSDO file on the school.

(b) Determine if an enforcement investigation is required (see volume 2, chapter 182 of this handbook).

F. Post Inspection Actions. Discuss any findings discovered during the inspection with the school. Bring areas that need improvement to the attention of the school. Compliment the areas that exceed certification or inspection requirements.

G. PTRS. Close PTRS.

7. TASK OUTCOMES. Completion of this task results in either of the following:

A. An indication of a satisfactory facility inspection in the FSDO file on the school.

B. A letter indicating an unsatisfactory inspection and indicating areas of deficiency or discrepancy.

9. FUTURE ACTIVITIES.

A. Schedule followup inspections for any deficiencies.

B. Possible enforcement investigation on items not in compliance.

FIGURE 144-1
LETTER INFORMING SCHOOL OF FACILITY INSPECTION

FAA Letterhead

[*date*]

[*school name and address*]

Dear [*name*]:

Inspectors from this office will conduct an inspection of your pilot school at [*time*] on [*date*]. The purpose of this inspection is to determine whether your school is operating in accordance with Federal Aviation Regulations Part 141.

Enclosed is a copy of the inspection job aid for your review. This job aid will be used to assist us in conducting the inspection. If you have any questions, please contact this office at [*telephone number*].

Sincerely,

[*principal operations inspector's signature*]

FIGURE 144-2
LETTER CONFIRMING RESULTS OF INSPECTION

FAA Letterhead

[*date*]

[*school name and address*]

Dear [*name*]:

The results of the inspection of your pilot school conducted on [*date*] are as follows:

- *List the discrepancies and the specific FAR requirement.*
- *Note any corrective action that was taken or needs to be taken.*
- *Note date of followup inspections, if necessary.*
- *Indicate that any items not corrected by a specific date may result in enforcement action, if already certificated.*
- *If all discrepancies were resolved by the date of this letter, indicate that no enforcement action is pending.*

Sincerely,

[*principal operations inspector's signature*]

FIGURE 144-3
FAR PART 141 FACILITY INSPECTION JOB AID

NAME OF SCHOOL	INSPECTION TEAM				
	Name	Specialty			
ADDRESS	INSP. INITIAL	DATE	SAT	UNS	N/A
1. TCO's					
a. Current					
b. Conforms to copy from district office file					
c. All changes FAA approved					
2. Verification of flight instructors' qualifications					
3. Chief instructor/assistant for each course					
4. Enrollment procedures conform to FAR § 141.93(a)(1)-(3)					
5. Copies of enrollments sent to district office					
6. Safety procedures/practices as per FAR § 141.93(a)(3)(i)-(x)					
7. Graduation certificates as per FAR § 141.95					
8. Recordkeeping as per FAR § 141.101(a)(1)-(3)					
9. Minimum Equipment Lists (MEL) current (if applicable)					
10. Aircraft meet requirements of FAR § 141.39/141.75					
11. Chief instructor standardization of all instructors					
12. Pilot briefing areas (FAR § 141.43)					
13. Ground training facilities (FAR § 141.45)					
14. Airports (FAR § 141.37)					
15. Ground trainers (FAR § 141.41(a))					
16. Training aids (FAR § 141.41(b))					
17. Air agency certificate matches one on file					
18. List of approved courses current					
19. Other					
REMARKS:					

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